

From: "Canfield, Gary" <GCANFIEL@padre.org>
To: <hansd@rb9.swrcb.ca.gov>
Date: 8/26/03 10:42AM
Subject: Permit and MRP cost savings

David,

Thank You for responding to my E-Mail so quickly. The following calculations reflect the approximate cost savings associated with the adjustments proposed in the new MRP.

Metals reduced from Quarterly to Annually.	\$3825	
Influent TN and NH3 Reduced from Bi-weekly to Monthly.		\$ 300
All Biweekly to Monthly tests	\$5408	
Total	\$9533	

There is a possible cost savings of \$5400 for the reduced Toxicity tests in the forth quarter. This savings is contingent upon favorable results of the quarterly tests performed during the year.

The added costs to the District are:

Organic Nitrogen, Monthly at stations 1-2,4-7 and lake #1	\$3360
Nitrites, Monthly at stations 1-2,4-7 and lake #1	\$1260
E-Coli Testing, Monthly at stations 1-2,4-7	\$2200
Chlorophyll-a, Monthly at stations 1-2,4-7	\$5400
Sediment Phosphorous, Monthly at stations 1-2,4-7	\$7200
Fish Tissue at Mission Ponds	\$2500
Periphyton, Quarterly at stations 1,6	\$8000
Benthic macroinvertebrates, Quarterly at stations 1,6	\$17,600
Total	\$47,520

The cost increase is \$37,987 to the district. With favorable results from the toxicity tests the cost increase would be \$32,587.

These adjustments net an increase of 38 - 45% to the budgetted \$85,000 for river monitoring. These calculations are slightly different than the original estimations. Notably the cost savings for the reduced toxicity test and the added costs for the nitrogen series tests were originally overlooked.

If you have any questions, please give me a call at (619) 258-4695

Thank You, Gary

From: "Canfield, Gary" <GCANFIEL@padre.org>
To: "White, Debbie" <DWHITE@padre.org>, <hansd@rb9.swrcb.ca.gov>
Date: 8/25/03 12:52PM
Subject: Permit Response

TENTATIVE
ORDER NO. R9-2003-0179
NPDES PERMIT NO. CA0107492

The following are a list of concerns and proposed adjustments that we would appreciate consideration.

Page 1.

Item 4.

Second sentence:

- The PDWRF has a ~~design~~ **rated average** capacity of 2.0 mgd.

Third sentence:

- Remove: *and portions of the unincorporated communities of Alpine, Blossom Valley, Crest, Dehesa, Flinn Springs, Harbisons Canyon*

Page 2.

Item 5.

Third Sentence:

- Add Anaerobic stage to the series.

Item 6.

First Sentence:

- Should Read: The Effluent from the PDWRF not recycled **for irrigation and industrial use** is discharged to the Santee Lakes,

Item 7.

Entire Statement

- Our research indicates the **Lower** San Diego is a 12-mile urban waterway not 20-mile. This would change the majority of the paragraph. If the **Middle** S.D. river is included, 20-miles is representative.

Item 8.

Typo

- **SB**WRF should be **PD**WRF

Page 7.

B. DISCHARGE SPECIFICATIONS

- Opening paragraph reads: “The discharge of treated wastewater **from the PDWRF to Sycamore Creek,**” The paragraph is followed by four important discharge limits and requirements that have been identified as limits that are specific to the discharge **from the PDWRF to the Santee Lakes.**

We request the wording to reflect the point of discharge **from the PDWRF to the Santee Lakes.**

Page 7.

B. DISCHARGE SPECIFICATIONS

- Items 1 and 2 state that not less than a removal of 85% BOD and TSS reduction will be performed.

We are requesting that these instructions be removed; we are required to meet a monthly average discharge of 15 mg/L for both constituents. Calculating percentage of removal is a time consuming task that does not provide meaningful information to either the operations or records of the treatment facility.

Page 15.

E. BIOSOLID REQUIREMENTS

- Remove the entire section. We do not have any biosolids handling at this facility. The instructions do not apply to us. We have a contractual agreement with San Diego MWD to handle all of our biosolids.

Page 37.

Item 6.

Entire Paragraph

- We would like clarification on these instructions. Duplicating samples for our quarterly and annual samples could cost as much as \$4000.00/ year. An acceptable QA/QC method addresses this subject without duplication.

Page 40.

Item 32.

Third and Forth Sentences:

- Within the sentences it should read: or any ~~improved~~ **approved** method

Page 45.

D. INFLUENT MONITORING

- The table shows a list of items to monitor. A series of Nitrogen and Phosphorous tests are listed. These are costly tests and are meaningless to the evaluation and operation of the treatment facility. Currently, we test for and report Total Nitrogen and Total Phosphorous.

Although the tests required to report Total Nitrogen and Total Phosphorous are similar to those listed in the series, we request that the report requirements stay as Total Nitrogen and Total Phosphorous. Adding organic nitrogen, nitrate, nitrite and orthophosphate phosphorous to the list of constituents, that must be reported, will not be useful in the operation or records of the treatment facility.

Page 46.

1. Station A – After dechlorination and prior to the discharge to Lake 7

- Continues recording is required for Specific Conductance, pH, and Turbidity. We are currently reporting these items to the RWQCB. The continuous sampling and monitoring is at the discharge from the Chlorine Contact Tank **before** dechlorination.

We request that footnote #3 be added to these three items to identify that the treated effluent is being continually monitored **before** dechlorination.

Page 46.

- The series of Nitrogen and Phosphorous tests were added to this permit for the point leaving the treatment facility. Through discussion with the RWQCB, we have determined that the point of concern is located at the discharge from Lake #1 to Sycamore creek. We are testing for and required to meet very stringent TMDL limits at the point where the treated effluent is discharged to Sycamore creek.

We request removing the requirement for reporting Nitrogen and Phosphorous at the point leaving the treatment facility.

Page 47.

- Footnote number 2.
 - Effluent turbidity analyses should be conducted using a continuous monitoring and recording turbidimeter. The discharger shall report monthly results of four-hour turbidity readings, average effluent (24-hours), 95 percentile effluent turbidity (24-hours), and the daily maximum (daily being defined as the 24-hour period from 12 am to 12 am). Continuous turbidity monitoring must also be provided prior to filtration to ensure adequate process control, and automatic coagulant feed when the turbidity of the secondary effluent is greater than 10 NTU.

We request that requirements for turbidity monitoring and reporting stay the same as they are written on page 8, item #4.

- Turbidity concentrations of the effluent shall not exceed a daily average of 2 Nephelometric Turbidity Units (NTU), shall not exceed 5 NTU more than 5% of the time during a 24-hour period, and shall not exceed 10 NTU at any time.

Page 49.

Core Receiving Water Monitoring

- Perform monthly sampling only during those months that we are discharging water to Sycamore Creek. Otherwise perform sampling on a quarterly basis.
- Footnote #3. States that the dissolved oxygen measurements shall be taken no later than 8:00 am and that we are responsible for reporting the % saturation (calculated based on temperature).

We request that the requirement for measurement of dissolved oxygen be changed to the earliest time possible. Our records show that the last sample is usually taken by 9:30 am. We would also ask that the reporting of temperature and dissolved oxygen, would meet the necessary requirements of the District, eliminating the time consuming task of calculating the % saturation at each point. The receiving water monitoring plan implementation requires several field tests and the collection of samples in various containers, depending on the test to be done and the preservative to be used, and travel time between the sites. Meeting the 8:00 deadline would require either using multiple sampling teams, scheduling sampling on different days, beginning earlier in the day, or visiting each sample point twice, Once for D.O. and once to take the remainder samples and tests. Each of these alternatives is more costly than the method of visiting each sample only once in a sequential manner.

Page 50.

2. Regional Watershed Monitoring

- We request that the instructions in the first sentence be removed from our permit requirements. Our obligations should be limited to the direction set forth in the permit instructions and MRP.

Financial impact due to the new MRP

We appreciate the effort that has gone into preparing this new permit. We have carefully researched the abilities of the District to meet the requirements within the new permit. We understand that an effort was made to reduce the monitoring frequency of many items that are currently required of us. These cost reductions were considered in the final calculated increases. The following tests are added to the new MRP.

- E-Coli at stations 1-2,4-7 each month at approximately \$2200/year
- Chlorophyll-a at stations 1-2,4-7 each month at approximately \$5400/year
- Fish tissue test at Mission Ponds at approximately \$2500/year
- Sediment phosphorous series at stations 1-2,4-7 each month at approximately \$7200/year
- Periphyton analysis at stations 1,6 each quarter at approximately \$8000/year
- Benthic macroinvertebrate analysis at stations 1,6 each quarter at approximately \$17,600/year

We have concluded that there will be an added cost of at least \$40,000 per year to address all of the additional monitoring and testing requirements in this MRP. The costs associated with these tests will be added to the existing budget of approximately \$85,000/year for river monitoring. This new MRP will force an increased cost of 47% to the existing monitoring budget.

We would appreciate the opportunity to make final comments to the Permit and MRP prior to the end of the review period.